

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**LOYALTY CONVERSION SYSTEMS
CORPORATION,
Plaintiff,
v.
AMERICAN AIRLINES INC.**

**JETBLUE AIRWAYS CORPORATION,
Defendants.**

Case No: 2:13-cv-655-JRG (Lead Case)

Case No. 2:13-cv-662-JRG

AGREED MOTION TO EXTEND DEADLINES

Plaintiff Loyalty Conversion Systems Corporation (“Plaintiff” or “Loyalty Conversion”) and Defendant, JetBlue Airways Corporation (“JetBlue”) hereby move to extend the 30(b)(6) deposition date of JetBlue, and the Plaintiff’s deadline to respond to JetBlue’s Rule 12(b)(3) Motion to Dismiss. Counsel for JetBlue has been ill, and the parties agree to move the dates set forth in the Court’s December 23, 2013 Order (D.E. 24) as follows:

1. Plaintiff and Defendant JetBlue have agreed that Plaintiff’s deposition of JetBlue’s corporate representative pursuant to the Court’s December 23, 2013 Order (D.E. 24) will be rescheduled for February 5, 2014.

2. Plaintiff’s deadline to respond to Defendant JetBlue’s Rule 12(b)(3) Motion to Dismiss be extended to and including February 19, 2014.

3. Good cause exists for moving these dates because lead counsel for JetBlue was diagnosed with strep throat on January 8 and did not return to the office until January 13.

Dated: January 13, 2014

Respectfully submitted,

/s/ Andrew G. DiNovo

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email and/or fax, on this the 13th day of January 2014.

/s/ Casey L. Griffith

Casey L. Griffith

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h), and that Plaintiff concurs with the relief sought in the foregoing motion. The personal conferences were conducted between Andrew G. DiNovo and Stefanie T. Scott, attorneys for Plaintiff, and Casey L. Griffith, counsel for Defendant, on or around Friday, January 10, 2014 and Monday, January 13, 2014. The parties were able to agree on the substance of the Agreed Motion as reflected above.

/s/ Casey L. Griffith
Casey L. Griffith